

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST PUBLISHING)
CORPORATION,)
Plaintiffs and)
Counterdefendants,)
v.) C.A. No. 20-613 (SB)
ROSS INTELLIGENCE INC.,)
Defendant and)
Counterclaimant.)

**THOMSON REUTERS' MOTION TO EXCLUDE DR. ALAN COX
AND MOTION FOR SUMMARY JUDGMENT ON
ROSS'S ANTITRUST COUNTERCLAIMS (NO. 5) – COMCAST**

Pursuant to Federal Rule of Civil Procedure 56, Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (collectively, "Thomson Reuters") respectfully move to exclude certain testimony, argument, or evidence regarding the opinions of ROSS Intelligence's expert Dr. Alan Cox and for entry of summary judgment on ROSS Intelligence Inc.'s antitrust counterclaims (Counts VI, VII, and VIII).

The grounds for this motion are set forth in Thomson Reuters' opening brief and supporting exhibits and declarations, filed concurrently. A proposed order is attached.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn

Jack B. Blumenfeld (#1014)

Michael J. Flynn (#5333)

1201 North Market Street

P.O. Box 1347

Wilmington, DE 19899

(302) 658-9200

jblumenfeld@morrisnichols.com

mflynn@morrisnichols.com

OF COUNSEL:

Daniel E. Laytin, P.C.
Christa C. Cottrell, P.C.
Cameron Ginder
Max A. Samels
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
(312) 862-2000

*Attorneys for Plaintiffs and Counterdefendants
Thomson Reuters Enterprise Center GmbH and West
Publishing Corporation*

August 31, 2023

CERTIFICATION UNDER D. DEL. LR 7.1.1

Pursuant to D. Del. LR 7.1.1, counsel for Plaintiffs discussed the foregoing Motion to exclude expert testimony with counsel for Defendant, who stated that Defendant opposes the requested relief.

/s/ Michael J. Flynn

Michael J. Flynn (#5333)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST PUBLISHING)
CORPORATION,)
Plaintiffs and)
Counterdefendants,)
v.) C.A. No. 20-613 (SB)
ROSS INTELLIGENCE INC.,)
Defendant and)
Counterclaimant.)

[PROPOSED] ORDER

This Court, having considered Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation's (collectively, "Thomson Reuters") Motion to Exclude the Testimony of Dr. Alan Cox and Motion for Summary Judgment on ROSS Intelligence Inc.'s Antitrust Counterclaims (No. 5) – Comcast and the related briefing and argument thereto,

IT IS HEREBY ORDERED this _____ day of _____ 2023 that Thomson Reuters' Motion to Exclude the Testimony of Dr. Alan Cox and for Summary Judgment is **GRANTED.**

Date: _____

The Honorable Stephanos Bibas

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on August 31, 2023, upon the following in the manner indicated:

David E. Moore, Esquire
Bindu Palapura, Esquire
Andrew L. Brown, Esquire
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 North Market Street
Wilmington, DE 19801
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

Mark A. Klapow, Esquire
Lisa Kimmel, Esquire
Crinesha B. Berry, Esquire
Matthew J. McBurney, Esquire
CROWELL & MORING LLP
1001 Pennsylvania Avenue NW
Washington, DC 20004
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

Gabriel M. Ramsey, Esquire
Jacob Canter, Esquire
Warrington Parker, Esquire
Margaux Poueymirou, Esquire
Anna Z. Saber, Esquire
Beatrice B. Nguyen, Esquire
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
San Francisco, CA 94111
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

Shira Liu, Esquire
CROWELL & MORING LLP
3 Park Plaza, 20th Floor
Irvine, CA 92614

Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

/s/ Michael J. Flynn

Michael J. Flynn (#5333)